

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RACHEL LIEBER, individually, and on)
behalf of all others similarly situated,) CASE NO. 16-cv-02868-PAG
Plaintiff,)
vs.) Judge Patricia A. Gaughan
WELLS FARGO BANK, NA,)
Defendant.)
PLAINTIFF'S MOTION TO FILE
PLAINTIFF'S SECOND MOTION TO
COMPEL AND PLAINTIFF'S
SUPPLEMENT TO HER FIRST
MOTION TO COMPEL UNDER SEAL

GRANTED.
/s/ Patricia A. Gaughan

8/25/17
NOW COMES Plaintiff Rachel Lieber (“Plaintiff”), by and through counsel, and for her *Motion to File Plaintiff's Second Motion to Compel and Plaintiff's Supplement to Her First Motion to Compel Under Seal* (“Motion”), states as follows:

On March 22, 2017, the Court entered a Stipulated Protective Order (“Protective Order”) governing the designation of documents, testimony, and information provided through discovery in the case as “Confidential.” (Dkt. # 20).

On August 24, 2017, Plaintiff served upon counsel for Defendant her *Second Motion to Compel Defendant's Responses to Plaintiff's Discovery Requests and to Redepose Defendant's Corporate Representative* (“Second Motion to Compel”), and her *Supplement to Plaintiff's Motion to Compel Defendant's Responses to Plaintiff's Discovery Requests and to Extend the Non-Expert Discovery Deadline* (“Supplement”).

Plaintiff's Second Motion to Compel and Supplement reference exhibits attached thereto that include documents and testimony designated by Defendant as “Confidential.”

The Protective Order “does not authorize filing under seal,” and therefore, Plaintiff requests leave to file her Second Motion to Compel and Supplement under seal. (Dkt. # 20, ¶ 3).